

**Daniel J. Rylander, P.C.
Attorney At Law
2701 E. Speedway Blvd., Suite 203
Tucson, Arizona 85716
Office (520) 299-4922-Fax (520) 299-1482**

Daniel J. Rylander
PAN #64969 - Ariz. Bar #15279
Attorney for Debtors

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF ARIZONA

In re:

Chapter 11 Jointly Administered Cases

FRANK SHANE FOLSOM AND DIANA A.
FOLSOM,
Debtors.

NO. 4:15-bk-05692-BMW

In re:

NO. 4:16-bk-14236-BMW

DESERT FUN FOODS, LLC,
Debtor

WILMINGTON SAVINGS FUND SOCIETY,
FSB, d/b/a Christiana Trust, as
indenture trustee, for the CSMC
2017-1 Trust, Mortgage-Backed
Notes, Series 2017-1, its
assignees and/or successors, by
and through its servicing agent
Select Portfolio Servicing,
Inc.,

**OBJECTION TO MOTION FOR RELIEF
FROM AUTOMATIC STAY**

Movant,

v.

FRANK SHANE FOLSOM AND DIANA A.
FOLSOM

Respondents.

The Debtors Folsom, through their attorney, undersigned, hereby object to the Motion for Relief from The Automatic Stay (the "Motion"), and in support of such objection, states as follows:

1. The subject property is necessary to the Debtors' effective reorganization, as the subject property is the Debtors' residence. The property that is subject to Movant's interest is worth \$125,000, as listed by the Debtors on Schedule A of their Schedules.

2. Movant claims it is owed \$56,378.18 total outstanding debt. The equity in the subject property provides Movant with adequate protection for their interest in the subject property.

3. Movant claims there is no equity but provides no basis for such assertion.

4. The Debtors have been in touch with and agreed with Movant's counsel's request for a cure to the alleged delinquency but such agreement is not yet documented.

WHEREFORE, it is respectfully requested that Movants' motion be denied, and for such other and further relief as the Court deems just.

Dated January 4, 2018

/s/ Daniel J. Rylander
DANIEL J. RYLANDER
DANIEL J. RYLANDER, P.C.
Attorney for Debtor

1
2 Copy of the foregoing mailed/
3 served January 4, 2018
4 to/on the following:

5 Lakshmi Jagannath, Esq.
6 MCCARTHY & HOLTHUS, LLP
7 8502 E. Via de Ventura, Suite 200
8 Scottsdale, AZ 85258
9 bknotice@mccarthyholthus.com